



January 20, 2023

VIA ECF AND EMAIL

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, New York 10007

Re: *United States v. Brijesh Goel*, No. 22-CR-396-PKC

Dear Judge Castel:

We write on behalf of Defendant Brijesh Goel in the above-captioned case to respectfully request permission to redact or seal portions of Mr. Goel's Omnibus Pre-Trial Motions and supporting papers. The portions of the filings that Mr. Goel seeks to file under seal and/or with redactions reflect information designated by the Government as Highly Confidential, as defined by Paragraph 7 of the Protective Order. ECF No. 9 at ¶ 7. Mr. Goel requests permission to file his Omnibus Pre-Trial Motions and supporting papers under seal and/or with redactions as follows:

- Mr. Goel requests permission to file a redacted Memorandum of Law.
- Mr. Goel requests permission to file Exhibits 4, 6, 7, 28, 29, and 31, attached to the Declaration of Adam Ford, completely under seal.¹
- Mr. Goel requests permission to file redacted versions of Exhibits 5 and 8, attached to the Declaration of Adam Ford.
- Mr. Goel requests permission to file Exhibit A, attached to the Memorandum of Law, completely under seal.

We are providing Your Honor's Chambers and the Government unredacted copies of this letter, the Memorandum of Law in Support of Mr. Goel's Omnibus Pre-Trial Motions, and all exhibits filed under seal and/or with redactions.

We thank the Court for its consideration.

The Court provisionally grants the application to file under seal and file a redacted Memorandum.
SO ORDERED
[Signature]
USDJ
1-26-23

¹ Exhibits 28 and 29 are draft transcripts of recordings produced by the Government to Mr. Goel pursuant to a stipulation between the parties. Mr. Goel requests permission to file Exhibits 28 and 29 under seal due to the parties' stipulation.



Respectfully submitted,

/s/ Adam C. Ford

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